

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

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REGIONS ASSET COMPANY,

Plaintiff,

v.

REGIONS UNIVERSITY, INC.

Defendant.

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Civil Action No. 2:06-cv-882-MHT

**PLAINTIFF'S INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, plaintiff Regions Asset Company ("Regions") by its attorneys, hereby provides the following initial disclosures of discoverable information that Regions may use to support its claims. The information set forth below is preliminary and does not reflect any discovery in this case from the defendant Regions University, Inc. ("Regions University"). Regions reserves the right to supplement the information provided herein with additional or different information following receipt of discovery and additional investigation of relevant facts.

**A. Names, Addresses and Phone Numbers of Witnesses Likely to Have Discernable Information that Regions May Use to Support Its Claims**

Set forth below are the names of witnesses currently known to Regions who are likely to have discernable information that Regions may use to support its claims.

1. Russ Dunman  
Retail Executive Senior  
Regions Bank  
8 Commerce Street, 12th Floor  
Montgomery, AL 36104  
(334) 832-8631

- The operations of Regions in Montgomery, Alabama and elsewhere, including its advertising and promotion and the REGIONS services offered at Regions and on its website at [www.regions.com](http://www.regions.com).
2. Michael Pollard  
Director of Organizational Development & Learning  
Regions Financial Corporation  
7130 Goodlett Farms Parkway  
Cordova TN 38018  
Tel: (901) 580-4495
- The operations of Regions University in Alabama and elsewhere.
3. Carlton Barker of the Montgomery office of Regions  
President  
Regions Bank, Montgomery, Alabama  
8 Commerce Street, 2nd Floor  
Montgomery, AL 36104  
Tel: 334.832.8263
- The operations of Regions in Montgomery, Alabama, including its revenues, advertising and promotions and the REGIONS services offered in the Montgomery, Alabama, branches.

**B. Description by Category and Location of Documents and Things**

The following documents and things will be available at offices of plaintiff's counsel at Balch & Bingham LLP, 105 Tallapoosa St., Suite 200, Montgomery, Alabama 36104: REGIONS trademark registrations and applications; Regions advertising and promotional materials, both current and historical; printouts of web pages from Regions' website, [www.regions.com](http://www.regions.com), including information on Regions' REGIONS UNIVERSITY program; new employee orientation guide with information on Regions' REGIONS UNIVERSITY training program; Regions' 2005 annual report; and Training magazine's Top 100 training programs.

Other documents and things relating to the subject matter of the above witnesses' testimony are located at or near the addresses of such witnesses indicated above.

Respectfully submitted this 15th day of December, 2006.

/s/Paul A. Clark

One of the Attorneys for Plaintiff Regions Asset  
Company

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Facsimile: (202)429-3902  
wpecau@steptoe.com

**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing with the Clerk of the Court and service will be perfected electronically upon the following this the 15<sup>th</sup> day of December, 2006:

Victor T. Hudson  
William W. Watts, III  
Hudson & Watts, LLP  
Post Office Box 989  
Mobile, Alabama 36601-0989

and by placing a copy thereof in the United States Mail, postage prepaid, and properly addressed to them on this the 15<sup>th</sup> day of December, 2006:

James E. Shlesinger  
Shlesinger, Arkwright & Garvey LLP  
1420 King Street  
Suite 600  
Alexandria, Virginia 22314

/s/Paul A. Clark  
Of Counsel